

From: Fugh, Justina
To: (b) (6)
Subject: checking in regarding Mr. Pruitt's financial disclosure report
Date: Tuesday, September 04, 2018 4:21:00 PM

Hi there,

I hope that you had an enjoyable Labor Day weekend. I'm writing to say that I heard from OGE about their questions regarding Mr. Pruitt's report. Set forth below are the questions that EPA had regarding his report, and I've inserted OGE's as well. One question that I've asked OGE – but have not yet heard back – is whether the names of Mrs. Pruitt's clients are reportable on the form. Also, we do still need to know that transaction information for the withdrawals.

Just a time check reminder – we are obliged under the Ethics In Government Act to release the report to requestors no later than September 12th. Ideally, we like to have the form certified by the EPA ethics official first.

Comments of Reviewing Officials

PART	#	REFERENCE	COMMENT
3	1	(b) (6)	(08/16/18, Fugh, Justina): (b) (6)
5	1	(b) (6)	(08/16/18, Fugh, Justina): (b) (6)
5	1	(b) (6)	(08/17/18, Pruitt, Scott): (b) (6)

1. Please report the spouse's small business using the guidance and the example below. The filer currently reports an LLC entry and a consulting firm. Rather than reporting "LLC distribution," the specific type of income is reportable for a small business, as well as the type of services (e.g., software, HR, engineering, etc.).

Report a small business that your spouse operates in Part 5.

Note that other entries in this guide specifically address [farms](#), [law firms](#), and [corporate stock](#). See those entries for more targeted guidance if applicable.

Description	EIF	Value	Income Type	Income Amount
Advanced Systems, LLC (software)	N/A	\$500,001 - \$1,000,000	business income	
ABC Holdings, Inc., S-Corp, d/b/a Jones Management Solutions (HR consulting)	N/A	\$15,001 - \$50,000	business income	
Accountant, sole proprietor	N/A	\$1,001 - \$15,000	accounting fees	
Piano teacher, sole proprietor	N/A	\$1,001 - \$15,000	lesson fees	

COMMENT
FROM OGE

2. Does the spouse receive other compensation or other benefits from the LLC?
 - a. Severance payments?
 - b. Bonuses?
 - c. Deferred compensation?
 - d. Defined benefit plan?
 - e. Defined contribution plan?
 - f. Any other reportable items?
3. Has the spouse received any income for an appearance, speech or article through the LLC?

6	2	(b) (6)	(08/16/18, Fugh, Justina): (b) (6) Margaret Ross is available to work with you or financial adviser to assist with entering the data
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8	1	(b) (6)	(08/16/18, Fugh, Justina): (b) (6)
			That's a suggestion from the Office of Government Ethics' help guide

8	2	(b) (6)	(08/16/18, Fugh, Justina): (b) (6)
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8	3	(b) (6)	(08/16/18, Fugh, Justina): (b) (6)
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Please let me know if you have any questions.
Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Fugh, Justina](#)
To: (b) (6)
Subject: Extension for Mr. Pruitt to file his termination report
Date: Friday, July 27, 2018 6:15:00 PM

Hi there,

I was startled to see that your message was sent at 5:35 am. Wow! That's very early!

Thanks for your message and inquiry about an extension for Mr. Pruitt's termination report. We cheerfully accept your notification on behalf of your client that he needs more time, and have granted him the 45 day extension of time. His termination report is now due on September 20, 2018. His annual report, however, is still due on August 13, 2018. As set forth at 5 C.F.R. § 2634.704, though, there is a 30 day grace period following that deadline before any assessment of late fees.

In the event that it's helpful, allow me to take this opportunity to remind Mr. Pruitt that he will need to report his spouse's employment related assets and income in Part 5 of the reports. And, unlike his nominee report, he will need to report in Part 9 about gifts and travel reimbursements that he received during the applicable reporting period for both reports. For his annual report, that period is calendar year 2017, and for the termination report, it will be calendar year 2018.

Definition of gift

A gift includes any gratuity, favor, discount, entertainment, hospitality, loan, forbearance, or other item having monetary value. It includes services as well as gifts of training, transportation, local travel, lodgings and meals, whether provided in-kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred. See 5 C.F.R. § 2635.203(b).

Reporting of gifts

The filer must report gifts received that total more than \$390 from a single source during the [reporting period](#). When determining whether the total value of gifts from a single source exceeds \$390, do not need to include any gifts that had a value of \$156 or less. Also, certain gifts are not reportable. The filer need not report the following gifts and travel reimbursements:

- Anything given to your spouse or dependent child totally independent of their relationship to you (e.g., your spouse's business-related travel reimbursements).
- Anything for which you paid fair market value.
- Anything accepted by the United States Government under a statute or contract (e.g., travel payments accepted under 31 U.S.C. § 1353).
- Anything received when you were not an employee of the United States Government.
- Anything received from a ["relative."](#)
- Bequests and other forms of inheritance.
- Suitable mementos of a function honoring you (e.g., retirement party).
- Communications to your office, including subscriptions to newspapers and periodicals.
- Nonbusiness gifts of personal hospitality (food, lodging, and entertainment, but not transportation) at the donor's personal residence or family property.
- Food, lodging, transportation, entertainment, or reimbursements provided by a foreign government within a foreign country or by the United States Government, the District of Columbia, or a state or local government.
- Food and beverages that are not consumed in connection with a gift of overnight lodging.
- Reimbursements required to be reported under the Foreign Gifts and Decorations Act.
- Reimbursements received for political trips that must be reported under § 304 of the Federal Election Campaign Act of 1971.

Gifts that we expect to see on the financial disclosure report

We want to remind you that there are several items that will need to be reported as gifts on the financial disclosure report, unless Mr. Pruitt decided to compensate the donors for the items received instead:

- Southwest Airlines Buddy Pass – Prior to his resignation, Mr. Pruitt was going to meet with Kevin Minoli, the

Designated Agency Ethics Official, to discuss the arrangement between Mr. Pruitt and Kenneth Wagner regarding buddy passes on Southwest Airlines. In consultation with the Office of Government Ethics, OGC/Ethics concluded that the buddy passes amounted to impermissible gifts between government employees because they were offered by a subordinate to a superior and were worth more than \$10. Had Mr. Minoli met with Mr. Pruitt, he would have advised him to reimburse Mr. Wagner for the full price of each of Southwest tickets as well as the fees associated with them, rather than split the cost of each ticket. Doing so would eliminate the impermissible gift between employees concern. If, however, Mr. Pruitt did not or decides not to reimburse Mr. Wagner for the tickets, then we would expect to see those Southwest tickets appear on the financial disclosure report, unless each one was less than \$156 (including associated fees) and therefore not included in the aggregation.

- Legal Defense Fund – According to the Office of Government Ethics, Mr. Pruitt must report gifts received by a legal defense fund established for his benefit. Here are some helpful FAQs set forth in the OGE guide:

Do I report gifts received by a legal defense fund established for my benefit?

Yes. Report gifts to a legal defense fund totaling more than \$390 from a single source that were received during the reporting period for a fund established for your benefit. Aggregate all reportable donations from the same source and report if the total exceeds \$390.

Source Name	City/State	Brief Description	Value
Matthew Jones	Encinitas, CA	Cash donation to the Audrey Duke Legal Defense Fund	\$400

Source Name: Provide the identity of the source of the gift to the legal defense fund.

City/State: Provide the source's city and state of business or residence.

Brief Description: Describe the nature of the gift and specify the fund to which the donation was made.

Value: Provide the fair market value of the gift(s). If the gift is a cash donation, provide the exact amount.

Do I report gifts distributed to me by a legal defense fund that was established for a small class of recipients?

Yes. Report gifts totaling more than \$390 that were distributed to you during the reporting period by a legal defense fund that was established for a small class of recipients. The gift may be reported in such a manner provided that there is independent, public reporting by the fund of donations to the fund totaling more than \$390, including donor names, the city/state of the donors, and the value of the donations.

Source Name	City/State	Brief Description	Value
Washington Legal Defense Fund	Washington, DC	Cash distribution from the Washington Legal Defense Fund. Individual donors to this fund are listed at [website address]	\$800

Source Name: Provide the name of the legal defense fund.

City/State: Provide the source's city and state of business or residence.

Brief Description: Describe the nature of the gift and provide a description of where to locate additional reporting information.

Value: Provide the fair market value of the gift(s). If the gift is a cash distribution, provide the exact amount.

Please let me know if you have any questions about his filing requirements, or if he finds that he needs more time to file his termination report. Otherwise, we'll be expecting his reports by the due dates.

Happy Friday,

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North William Jefferson Clinton Federal Building | Washington DC 20460 (for ground deliveries use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

-----Original Message-----

From: (b) (6)

Sent: Thursday, July 26, 2018 5:35 AM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: Re: follow up to your call to Ryan Jackson, Chief of Staff

Thank you for your response. My apologies for not being able to get back to you yesterday.

Originally, I was hoping we could get the termination report prepared and completed in order to file it on the same day as the 2017 annual report. I am now thinking we need additional time although I know Mr. Pruitt would like to file it as soon as possible.

Why don't we go ahead and ask for the 45 day extension to be safe, and our goal is to file sooner if possible.

Does Mr. Pruitt need to sign a request to that effect or may I do that on his behalf via this written request?

Let me know. Thank you so much. (b) (6)

(b) (6)

(b) (6)

(b) (6)

(b) (6) (cell)

(b) (6) (office)

Sent from my iPhone

On Jul 24, 2018, at 7:40 PM, Fugh, Justina <Fugh.Justina@epa.gov<mailto:Fugh.Justina@epa.gov>> wrote:

Dear (b) (6),

Mr. Jackson has referred to me your inquiry about Mr. Pruitt's financial disclosure obligations. As the Alternate Designated Agency Ethics Official, I can provide you with information and assistance.

As you know, Mr. Pruitt currently faces two financial disclosure obligations. His annual report (covering CY 2017) was due on May 15, 2018, but he asked for and we granted him the maximum extension of 90 additional days. That report is now due on August 13, 2018. He also has an obligation to file a termination report (covering CY 2018), and that report is currently due on August 30, 2018. If he needs additional time to file the termination report, then he may ask for an extension of time. The maximum extension is 90 additional days.

Do I understand correctly from Mr. Jackson that you have inquired about filing both reports on the same day?
Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308
North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

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signature, nor is it intended to reflect an intention to make an agreement by electronic means.

From: [Fugh, Justina](#)
To: (b) (6)
Subject: extension of time for filing the termination report
Date: Thursday, September 06, 2018 3:23:00 PM

Hi there,

I'll be happy to give Mr. Pruitt additional time to file his termination report, but under the regulations, I need a written request with a reason. We'll accept any credible reason, like the need to gather more information, other demands on his time and attention, or vacation/workload issues. Just please send me a quick email (it can come from you on his behalf) and then I'll give him the additional time. I checked, and the additional 45 days will mean his termination report will be due on November 5, 2018.

Justina

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Also, inasmuch as we are still working on the 2017 Annual Report, is it possible to get an additional 45 days extension for the Termination Report? I don't know that I will need all that time but I have not started it yet, focusing first on the Annual Report.

Let me know about that.

I will review all this from OGE and let you know if I have any questions.

Thanks! (b) (6)

(b) (6)
(b) (6)
(b) (6)

(b) (6) (cell)
(b) (6) (office)

Sent from my iPhone

otherwise, nothing contained in this message should be construed as a digital or electronic signature, nor is it intended to reflect an intention to make an agreement by electronic means.

From: [Fugh, Justina](#)
To: (b) (6)
Subject: follow up to our conversation this morning
Date: Monday, August 20, 2018 5:28:00 PM

Hi there,

I'm sorry that it has taken me nearly all day to get back to you, but my day completely escaped me. With regard to Mr. Pruitt's annual report, it seems that he has (b) (6)

[REDACTED]

[REDACTED] Those are the transactions that need to be reported.

Let's see if this helps. I compared Mr. Pruitt's nominee report against his annual report.

(b) (6)

NAME OF ASSET	PREVIOUSLY REPORTED ON NOMINEE REPORT	NOW REPORTING ON ANNUAL REPORT	DATE OF SALE? AMOUNT OF TRANSACTION?
(b) (6)			

Because Mr. Pruitt's report will need to be certified by the Office of Government Ethics, I have asked them to engage now so that we have no surprises from their end later. I wondered about how he has reported (b) (6)

[REDACTED]

[REDACTED] so that's why I asked for their input. I should receive more information from OGE on Wednesday afternoon. Just letting you know that I'll be back in touch about that

soon.

Justina

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From: [Fugh, Justina](#)
To: (b) (6)
Subject: follow up to your call to Ryan Jackson, Chief of Staff
Date: Tuesday, July 24, 2018 7:40:00 PM

Dear (b) (6),

Mr. Jackson has referred to me your inquiry about Mr. Pruitt's financial disclosure obligations. As the Alternate Designated Agency Ethics Official, I can provide you with information and assistance.

As you know, Mr. Pruitt currently faces two financial disclosure obligations. His annual report (covering CY 2017) was due on May 15, 2018, but he asked for and we granted him the maximum extension of 90 additional days. That report is now due on August 13, 2018. He also has an obligation to file a termination report (covering CY 2018), and that report is currently due on August 30, 2018. If he needs additional time to file the termination report, then he may ask for an extension of time. The maximum extension is 90 additional days.

Do I understand correctly from Mr. Jackson that you have inquired about filing both reports on the same day?

Justina

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From: [Fugh, Justina](#)
To: [Minoli, Kevin](#)
Subject: FW: a courtesy heads up
Date: Tuesday, September 11, 2018 6:45:00 PM

Well, here's what I sent her and her response to us. All it does is acknowledge that she got the note from me.

From: (b) (6)
Sent: Friday, August 10, 2018 5:42 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: Minoli, Kevin <Minoli.Kevin@epa.gov>
Subject: RE: a courtesy heads up

This is extremely helpful! Thank you!

Have a good weekend.

(b)
(6)

(b) (6)
P (b) (6)
C (b) (6)



From: Fugh, Justina [<mailto:Fugh.Justina@epa.gov>]
Sent: Friday, August 10, 2018 5:24 PM
To: (b) (6)
Cc: Minoli, Kevin
Subject: RE: a courtesy heads up

Hi there,

Just a note to confirm that we spoke, and I was able to explain the filing process a little more clearly. With your help, Mr. Pruitt will be filing his annual report (to cover CY 2017) on or before Monday, August 13th. EPA then has up to 30 days to review the report before we are required to release it upon request, and we will be using that 30 day period to work with you to be sure that he has duly reported what should be reported and correct any inadvertent errors. We will not release his report the day we receive it; rather, we will review it thoroughly first and work with you on his behalf to

resolve any issues or questions. As we discussed, he absolutely may include endnotes and comments to his report to further explain whatever he would like to explain. I appreciate your telling me that his Legal Defense Fund was not established until 2018, so that will not appear on the annual report.

You asked about the definition of income for Part 2, and I steered you to the definition in INTEGRITY itself. I've pasted that definition below for your reference:

EARNED and OTHER NON-INVESTMENT INCOME

The financial disclosure rules distinguish between investment income, earned income, and other non-investment income.

INVESTMENT INCOME

"Investment income" includes interest, rents, royalties, dividends, capital gains, and other income derived from an asset. Examples of investment income include, but are not limited to, income derived from: stocks, bonds, investment funds, and other securities; real estate; retirement investment accounts; annuities; the investment portion of life insurance contracts; interests in trusts and estates; collectible items; commercial crops; accounts or other funds receivable; and businesses.

The definition of investment income for our purposes of financial disclosure is specifically not tied to the Internal Revenue Service's definition of income for tax purposes. You need to report accrued income, even if deferred or exempt for tax purposes. For example, tax-deferred income in a retirement account is reportable in your financial disclosure report. Where you do not receive a report of the amount accruing, such as with United States savings bonds, you may make a good faith estimate.

EARNED INCOME

"Earned income" includes fees, salaries, commissions, honoraria, and any other compensation received for personal services but excludes U.S. Government salary and other federal benefits, including retirement and veterans' benefits. If personal services are a material factor in the production of income from an asset or business, it is considered "earned income" for purposes of financial disclosure rather than "investment income."

OTHER NON-INVESTMENT INCOME

A remainder category exists for income that does not fit into the investment income or earned income categories. Examples include prizes, scholarships, awards, and gambling winnings.

Finally, with respect to the Southwest companion passes, allow me to explain that they would be reportable on the financial disclosure report as a gift only if Mr. Pruitt did not pay Mr. Wagner for the full cost of the tickets. Should he decide not to pay, then those tickets are likely reportable entries on his report under "gifts."

EPA consulted with the Office of Government Ethics (OGE) about the Southwest companion pass arrangement, asking whether it constituted an impermissible gift between employees under 5 C.F.R. Part 2635, Subpart C. Under these provisions, a "superior" cannot accept a gift of more than \$10 from any subordinate. OGE concluded that the company pass arrangement allowed a supervisor to accept the gift of a "discounted" rate from the subordinate. Because the discounted rate exceeded \$10, it could not be accepted under 5 C.F.R. § 2635.302(b). While there is "personal friendship" exception under the gifts-between-employees rules, it cannot be applied if there is a clear subordinate-official superior relationship between the two employees. See 5 C.F.R. § 2635.302(b).

OGE concluded that the discounted tickets were indeed gifts because each ticket had a clear and

ascertainable value. OGE did not view the fee of \$5.60 as the “market value” of the ticket, but rather as a fee set forth at 49 C.F.R. § 1510.5 that is assessed for “nonrevenue passengers.” The fact that the airline does not receive remuneration and then charges a security fee does not mean that the value of the buddy pass is zero or even \$5.60. Instead, the value of the ticket is what it would otherwise cost for the superior to take the flight, which is ascertained by simply looking at the cost of what the subordinate paid for his ticket. In other words, OGE considers the market value of the gift to be the amount that the superior would have had to pay to fly, not the cost of the “free” ticket.

So Mr. Pruitt can either list the discounted Southwest Airlines tickets as a gift from Mr. Wagner, or he can repay Mr. Wagner and then not report that arrangement at all.

Please let me know if we can be of any further assistance. We look forward to assisting you in any way with Mr. Pruitt’s financial disclosure report.

Sincerely,
Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: (b) (6)
Sent: Friday, August 10, 2018 1:49 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: Minoli, Kevin <Minoli.Kevin@epa.gov>
Subject: RE: a courtesy heads up

Thank you for providing these letters. I appreciate it.

I would like to discuss with you some of the information discussed in the letters – Mr. Pruitt is concerned that he not sign anything that is incorrect and is aware that there are issues being reviewed regarding the items included in the letter you received. We do not want a subsequent finding of the existence of a gift to be used as a basis for some sort of recriminations or adverse proceedings by virtue of his having not disclosed such an item as a ‘gift’ on the financial disclosure reports – at this time, he is not aware of any reportable gifts. But we are also mindful of the fact that some of these alleged actions might somehow be translated by others into being deemed a ‘gift’.

I also have some specific questions regarding reporting of certain income in 2017 –

May I call you to discuss these items or do you prefer to either refer me to someone else or

communicate in writing.

I appreciate your assistance. Thank you! (b) (6)

(b) (6)
P (b) (6)
C (b) (6)
(b) (6)



From: Fugh, Justina [<mailto:Fugh.Justina@epa.gov>]

Sent: Friday, August 10, 2018 10:36 AM

To: (b) (6)

Cc: Minoli, Kevin

Subject: a courtesy heads up

Dear (b) (6),

I am writing to let you know that, yesterday, the EPA Designated Agency Ethics Official responded to a congressional inquiry from Senators Carper and Udall that, among other things, inquired about Mr. Pruitt's financial disclosure obligations. I have attached the incoming letter for your reference, as well as a copy of our response (the letters are identical, so I've given you just one). We were asked to provide copies of the requests for extensions, which we have done (but we did redact your contact information).

If you have any questions regarding this response, please let me know.

Justina

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From: [Fugh, Justina](#)
To: [Minoli, Kevin](#)
Cc: [Duross, Jeanne](#)
Subject: FW: Extension for Mr. Pruitt to file his termination report
Date: Friday, July 27, 2018 9:59:00 PM

Hi Kevin,

(b) (5)

but in the meantime, his personal lawyer contacted EPA to ask for an extension of time for filing the termination report. I have granted that 45-day extension, and as discussed briefly with you, took the opportunity to remind him about some of his reporting requirements. (b) (5)

(b) (5)

Jeanne – thanks for the draft. It was super helpful!
Justina

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From: Fugh, Justina
Sent: Friday, July 27, 2018 6:16 PM
To: (b) (6)
Subject: Extension for Mr. Pruitt to file his termination report

Hi there,
I was startled to see that your message was sent at 5:35 am. Wow! That's very early!

Thanks for your message and inquiry about an extension for Mr. Pruitt's termination report. We cheerfully accept your notification on behalf of your client that he needs more time, and have granted him the 45 day extension of time. His termination report is now due on September 20, 2018. His annual report, however, is still due on August 13, 2018. As set forth at 5 C.F.R. § 2634.704, though, there is a 30 day grace period following that deadline before any assessment of late fees.

In the event that it's helpful, allow me to take this opportunity to remind Mr. Pruitt that he will need to report his spouse's employment related assets and income in Part 5 of the reports. And, unlike his nominee report, he will need to report in Part 9 about gifts and travel reimbursements that he received during the applicable reporting period for both reports. For his annual report, that period is calendar year 2017, and for the termination report, it will be calendar year 2018.

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been incurred. See 5 C.F.R. § 2635.203(b).

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The filer must report gifts received that total more than \$390 from a single source during the reporting period. When determining whether the total value of gifts from a single source exceeds \$390, do not need to include any gifts that had a value of \$156 or less. Also, certain gifts are not reportable. The filer need not report the following gifts and travel reimbursements:

- Anything given to your spouse or dependent child totally independent of their relationship to you (e.g., your spouse's business-related travel reimbursements).
- Anything for which you paid fair market value.
- Anything accepted by the United States Government under a statute or contract (e.g., travel payments accepted under 31 U.S.C. § 1353).
- Anything received when you were not an employee of the United States Government.
- Anything received from a "relative."
- Bequests and other forms of inheritance.
- Suitable mementos of a function honoring you (e.g., retirement party).
- Communications to your office, including subscriptions to newspapers and periodicals.
- Nonbusiness gifts of personal hospitality (food, lodging, and entertainment, but not transportation) at the donor's personal residence or family property.
- Food, lodging, transportation, entertainment, or reimbursements provided by a foreign government within a foreign country or by the United States Government, the District of Columbia, or a state or local government.
- Food and beverages that are not consumed in connection with a gift of overnight lodging.
- Reimbursements required to be reported under the Foreign Gifts and Decorations Act.
- Reimbursements received for political trips that must be reported under § 304 of the Federal Election Campaign Act of 1971.

Gifts that we expect to see on the financial disclosure report

We want to remind you that there are several items that will need to be reported as gifts on the financial disclosure report, unless Mr. Pruitt decided to compensate the donors for the items received instead:

- Southwest Airlines Buddy Pass – Prior to his resignation, Mr. Pruitt was going to meet with Kevin Minoli, the Designated Agency Ethics Official, to discuss the arrangement between Mr. Pruitt and Kenneth Wagner regarding buddy passes on Southwest Airlines. In consultation with the Office of Government Ethics, OGC/Ethics concluded that the buddy passes amounted to impermissible gifts between government employees because they were offered by a subordinate to a superior and were worth more than \$10. Had Mr. Minoli met with Mr. Pruitt, he would have advised him to reimburse Mr. Wagner for the full price of each of Southwest tickets as well as the fees associated with them, rather than split the cost of each ticket. Doing so would eliminate the impermissible gift between employees concern. If, however, Mr. Pruitt did not or decides not to reimburse Mr. Wagner for the tickets, then we would expect to see those Southwest tickets appear on the financial disclosure report, unless each one was less than \$156 (including associated fees) and therefore not included in the aggregation.
- Legal Defense Fund – According to the Office of Government Ethics, Mr. Pruitt must report gifts received by a legal defense fund established for his benefit. Here are some helpful FAQs set forth in the OGE guide:

Do I report gifts received by a legal defense fund established for my benefit?

Yes. Report gifts to a legal defense fund totaling more than \$390 from a single source that were received during the reporting period for a fund established for your benefit. Aggregate all reportable donations from the same source and report if the total exceeds \$390.

Source Name	City/State	Brief Description	Value
Matthew Jones	Encinitas, CA	Cash donation to the Audrey Duke Legal Defense Fund	\$400

Source Name: Provide the identity of the source of the gift to the legal defense fund.

City/State: Provide the source's city and state of business or residence.

Brief Description: Describe the nature of the gift and specify the fund to which the donation was made.

Value: Provide the fair market value of the gift(s). If the gift is a cash donation, provide the exact amount.

Do I report gifts distributed to me by a legal defense fund that was established for a small class of recipients?

Yes. Report gifts totaling more than \$390 that were distributed to you during the reporting period by a legal defense fund that was established for a small class of recipients. The gift may be reported in such a manner provided that there is independent, public reporting by the fund of donations to the fund totaling more than \$390, including donor names, the city/state of the donors, and the value of the donations.

Source Name	City/State	Brief Description	Value
Washington Legal Defense Fund	Washington, DC	Cash distribution from the Washington Legal Defense Fund. Individual donors to this fund are listed at [website address]	\$800

Source Name: Provide the name of the legal defense fund.

City/State: Provide the source's city and state of business or residence.

Brief Description: Describe the nature of the gift and provide a description of where to locate additional reporting information.

Value: Provide the fair market value of the gift(s). If the gift is a cash distribution, provide the exact amount.

Please let me know if you have any questions about his filing requirements, or if he finds that he needs more time to file his termination report. Otherwise, we'll be expecting his reports by the due dates.

Happy Friday,

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North William Jefferson Clinton Federal Building | Washington DC 20460 (for ground deliveries use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

-----Original Message-----

From: (b) (6)

Sent: Thursday, July 26, 2018 5:35 AM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: Re: follow up to your call to Ryan Jackson, Chief of Staff

Thank you for your response. My apologies for not being able to get back to you yesterday.

Originally, I was hoping we could get the termination report prepared and completed in order to file it on the same day as the 2017 annual report. I am now thinking we need additional time although I know Mr. Pruitt would like to file it as soon as possible.

Why don't we go ahead and ask for the 45 day extension to be safe, and our goal is to file sooner if possible.

Does Mr. Pruitt need to sign a request to that effect or may I do that on his behalf vis this written request?

Let me know. Thank you so much. (b) (6)

(6)

(b) (6)

(b) (6)

(b) (6)

(b) (6) (cell)

(b) (6) (office)

Sent from my iPhone

On Jul 24, 2018, at 7:40 PM, Fugh, Justina <Fugh.Justina@epa.gov<mailto:Fugh.Justina@epa.gov>> wrote:

Dear (b) (6),

Mr. Jackson has referred to me your inquiry about Mr. Pruitt's financial disclosure obligations. As the Alternate

Designated Agency Ethics Official, I can provide you with information and assistance.

As you know, Mr. Pruitt currently faces two financial disclosure obligations. His annual report (covering CY 2017) was due on May 15, 2018, but he asked for and we granted him the maximum extension of 90 additional days. That report is now due on August 13, 2018. He also has an obligation to file a termination report (covering CY 2018), and that report is currently due on August 30, 2018. If he needs additional time to file the termination report, then he may ask for an extension of time. The maximum extension is 90 additional days.

Do I understand correctly from Mr. Jackson that you have inquired about filing both reports on the same day?
Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308
North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the
zip code) | phone 202-564-1786 | fax 202-564-1772

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From: [Fugh, Justina](#)
To: [Duross, Jeanne](#)
Subject: FW: follow up to your call to Ryan Jackson, Chief of Staff
Date: Tuesday, July 24, 2018 7:40:00 PM

Just FYI

From: Fugh, Justina
Sent: Tuesday, July 24, 2018 7:40 PM
To: (b) (6)
Subject: follow up to your call to Ryan Jackson, Chief of Staff

Dear (b) (6),

Mr. Jackson has referred to me your inquiry about Mr. Pruitt's financial disclosure obligations. As the Alternate Designated Agency Ethics Official, I can provide you with information and assistance.

As you know, Mr. Pruitt currently faces two financial disclosure obligations. His annual report (covering CY 2017) was due on May 15, 2018, but he asked for and we granted him the maximum extension of 90 additional days. That report is now due on August 13, 2018. He also has an obligation to file a termination report (covering CY 2018), and that report is currently due on August 30, 2018. If he needs additional time to file the termination report, then he may ask for an extension of time. The maximum extension is 90 additional days.

Do I understand correctly from Mr. Jackson that you have inquired about filing both reports on the same day?

Justina

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From: [Fugh, Justina](#)
To: (b) (6)
Subject: is Mr. Pruitt going to sign off on his annual report?
Date: Tuesday, September 11, 2018 10:14:00 AM

Hi there,

INTEGRITY shows that Mr. Pruitt still has not signed and submitted his annual report. Even if he doesn't sign it, EPA will have to release it tomorrow. But if he signs today, then I can ask Kevin Minoli to review and certify it today, too, so that the released report will show EPA signature too.

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Fugh, Justina](#)
To: [OGC Ethics](#)
Subject: Just for your reference
Date: Friday, July 06, 2018 1:58:00 PM
Attachments: [Departing EPA for Pruitt.docx](#)
[STOCK Act Negotiations Form.pdf](#)

Hi everyone,

(b) (5)
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

Justina

From: [Fugh, Justina](#)
To: [Ross, Margaret](#); [Minoli, Kevin](#)
Subject: outstanding 278s
Date: Monday, August 13, 2018 2:04:00 PM

Hi there,

I just checked, and the only annual 278s not yet submitted in INTEGRITY to us are: Scott Pruitt, Andrew Battin, Phillip Brooks, Jackie Mosby, Tom Wall and Anna Wood. I've heard from Jackie and Anna that they are working on theirs, and spoke to (b) (6) on Friday about Pruitt's. I'll send out one more reminder today, and again tomorrow. But all of the politicals have their reports in now!

justina

From: [Fugh, Justina](#)
To: [Minoli, Kevin](#); [Ross, Margaret](#); [Aarons, Kyle](#)
Subject: Pruitt filed his annual report yesterday
Date: Tuesday, August 14, 2018 8:21:40 AM

So he met the deadline. Now we have 30 days to look it over.

Sent from my iPhone

From: [Fugh, Justina](#)
To: [Minoli, Kevin](#)
Subject: Pruitt's 278
Date: Wednesday, September 12, 2018 10:17:00 AM

Hi Kevin,

You should now be able to go into INTEGRITY and see Pruitt's annual report, pending your signature as certifying official. On August 10, I provided Mr. Pruitt's lawyer with advice about those buddy passes, and she acknowledged receiving it. (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(b) *Responsibilities of reviewing officials*—(1) *Initial review*. The reviewing official may request an intermediate review by the filer's supervisor. In the case of a filer who is detailed to another agency for more than 60 days during the reporting period, the reviewing official shall obtain an intermediate review by the agency where the filer served as a detailee. After obtaining any intermediate review or determining that such review is not required, the reviewing official shall examine the report to determine, to his satisfaction that:

- (i) Each required item is completed; and
- (ii) No interest or position disclosed on the form violates or appears to violate:
 - (A) Any applicable provision of chapter 11 of title 18, United States Code;
 - (B) The Act, as amended, and the implementing regulations;
 - (C) Executive Order 12674, as modified by Executive Order 12731, and the implementing regulations; or
 - (D) Any other agency-specific statute or regulation which governs the filer.

(2) *Signature by reviewing official*. If the reviewing official determines that the report meets the requirements of paragraph (b)(1) of this section, he shall certify it by signature and date. The reviewing official need not audit the report to ascertain whether the disclosures are correct. Disclosures shall be taken at "face value" as correct, unless there is a patent omission or ambiguity or the official has independent knowledge of matters outside the report. However, a report which is signed by a reviewing official certifies that the filer's agency has reviewed the report, and that the reviewing official has concluded that each required item has been completed and that on the basis of information contained in such report the filer is in compliance with applicable laws and regulations noted in paragraph (b)(1)(ii) of this section.

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Fugh, Justina](#)
To: [Minoli, Kevin](#)
Cc: [Ross, Margaret](#)
Subject: Pruitt's annual report is now with EPA!
Date: Tuesday, September 11, 2018 6:04:00 PM
Attachments: [Pruitt annual report - uncertified.pdf](#)

Hi Kevin,

I just got Pruitt's annual report in INTEGRITY. This means that EPA can sign it. What I don't know, now that I think of it, is whether you can access his report yourself. See if you can get into INTEGRITY to see it under the "reviewers" tab. If so, then please review and certify. I've attached the pdf version of the report here for your information.

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Fugh, Justina](#)
To: [Minoli, Kevin](#)
Subject: Pruitt's annual report
Date: Tuesday, September 11, 2018 5:44:00 PM
Attachments: [Pruitt annual report - uncertified.pdf](#)

Hi Kevin,

Here is Pruitt's report. As I indicated, EPA can't sign this report, (b) (5)
Rather, the issue is that the signature section is LOCKED because Pruitt needs to submit it back to us. That's why you and I can't certify the report. (b) (5)

I have written to (b) (6) twice already about getting Pruitt to sign his form. I'll send her one more note tonight, indicating that we will release the form tomorrow afternoon. (b) (5)

Justina

From: [Fugh, Justina](#)
To: (b) (6)
Subject: questions from the Office of Government Ethics
Date: Friday, August 24, 2018 1:23:00 PM

Hi there,

Remember I said that I wasn't sure how to advise you about Mrs. Pruitt's income? I consulted with OGE, and here is what they say they need:

1. Please report the spouse's small business using the guidance and the example below. The filer currently reports an LLC entry and a consulting firm. Rather than reporting "LLC distribution," the specific type of income is reportable for a small business, as well as the type of services (e.g., software, HR, engineering, etc.).

Report a small business that your spouse operates in Part 5.

Note that other entries in this guide specifically address [farms](#), [law firms](#), and [corporate stock](#). See those entries for more targeted guidance if applicable.

Description	EIF	Value	Income Type	Income Amount
Advanced Systems, LLC (software)	N/A	\$500,001 - \$1,000,000	business income	
ABC Holdings, Inc., S-Corp, d/b/a Jones Management Solutions (HR consulting)	N/A	\$15,001 - \$50,000	business income	
Accountant, sole proprietor	N/A	\$1,001 - \$15,000	accounting fees	
Piano teacher, sole proprietor	N/A	\$1,001 - \$15,000	lesson fees	

2. Does the spouse receive other compensation or other benefits from the LLC?
 - a. Severance payments?
 - b. Bonuses?
 - c. Deferred compensation?
 - d. Defined benefit plan?
 - e. Defined contribution plan?
 - f. Any other reportable items?
3. Has the spouse received any income for an appearance, speech or article through the LLC?

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Fugh, Justina
Sent: Friday, August 17, 2018 6:05 PM
To: (b) (6)
Subject: RE: we have reviewed Mr. Pruitt's annual report and returned it with some questions

Hi,
I am in the office all day on Monday and Tuesday, but on travel on Wednesday. I am not a morning person, so would prefer after 9:30 am. How about 10 am on Monday?
Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North,
William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) |
phone 202-564-1786 | fax 202-564-1772

-----Original Message-----

From: (b) (6)
Sent: Friday, August 17, 2018 4:54 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Re: we have reviewed Mr. Pruitt's annual report and returned it with some questions

Let's talk about this on Monday. What's your availability?

(b) (6)

(direct)

(b) (6) (main)

(b) (6) (cell)

(b) (6) (fax)

(b) (6)

On Aug 17, 2018, at 4:50 PM, Fugh, Justina <Fugh.Justina@epa.gov<mailto:Fugh.Justina@epa.gov>> wrote:

You're right that a filer need not report transactions concerning the holdings within an EIF, but that's not what occurred. What Mr. Pruitt reports is that he made withdrawals from his accounts, which means that the broker sold off part of his ownership interest in specific funds. Each of those sales from those funds are the withdrawals that are reportable as transactions.

-----Original Message-----

From: (b) (6)
Sent: Friday, August 17, 2018 3:39 PM
To: Fugh, Justina <Fugh.Justina@epa.gov<mailto:Fugh.Justina@epa.gov>>
Subject: Re: we have reviewed Mr. Pruitt's annual report and returned it with some questions

I've never ever had any directive to report transactions within EIF's. That's the whole point of EIF's. He has no control over the transactions or the management of the funds and each of the funds meet the qualifications of EIF's. Literally, I have been doing this a long time and have always understood that transactions within EIF's are not reportable.

I just arrived from the airport and am just now looking through all this - but the EIF transaction reporting is something I think we need to talk about as it is wholly contrary to everything I've ever been told and every report I've ever prepared. Whether House, Senate or Executive branch.

Will review the other notes. Thanks. (b)

(b) (6)

(cell)

(b) (6) (office)

Sent from my iPhone

> On Aug 17, 2018, at 3:18 PM, Fugh, Justina <Fugh.Justina@epa.gov<mailto:Fugh.Justina@epa.gov>> wrote:

>

> Because doing so is required pursuant to 5 CFR 2634.303(a)(2). While he need not report transactions from EIFs on a periodic basis, he is required to report those transactions on the annual and termination reports. Oh, and I just realized that he removed his personal mortgage from the liability section. As a former PAS filer, he is required by the STOCK Act, Pub. L. 112-015, appointees to any PAS position must report a mortgage or home equity loan secured by their personal residence as they would a mortgage on any other property. So please add that back into his report.

> Thanks,

> Justina

>

> Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

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> -----Original Message-----

> From: (b) (6)

> Sent: Friday, August 17, 2018 3:03 PM

> To: Fugh, Justina <Fugh.Justina@epa.gov<mailto:Fugh.Justina@epa.gov>>

> Subject: Re: we have reviewed Mr. Pruitt's annual report and returned it with some questions

>

> All of the investments are EIF's. Why does he need to report transactions?

>

> (b) (6)

(cell)

> (b) (6) (office)

> Sent from my iPhone

>

> On Aug 17, 2018, at 2:53 PM, Fugh, Justina
<Fugh.Justina@epa.gov<mailto:Fugh.Justina@epa.gov<mailto:Fugh.Justina@epa.gov%3cmmailto:Fugh.Justina@epa.gov>>> wrote:

>

> Hi there,

> Just a heads up that I have returned Mr. Pruitt's financial disclosure report to him for some clarifications. As you have been designated to view his form too, I've set out the comments below so you can see them more easily. Our only significant comment is that he will have to report transactions in Part 7, but we can help him if need be. See the comments below:

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> Comments of Reviewing Officials (not publicly displayed on report):

> PART

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> #

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> REFERENCE

>

> COMMENT

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> 3.

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> (b) (6) <https://urldefense.proofpoint.com/v2/url?u=https-3A__www.integrity.gov_efeds-2Dforms-2Dharness_ui_reviewReport.html-23_datagrid_arrangements_filing_11278D3A-2D2D39-2D4D27-2D97C4-2D4131B7F3B5CB_user_A333984_row_1C1B8A8E-2DC39A-2D47BB-2DA298-2DD8D040403E1F&d=DwMFAg&c=Rlm5WhGmPEr8srpDE4r86Q&r=VqoRkeE_5TDLJ3dg_fBnP_FE2i3QDPv7Z5MpUq8armE&m=SBx5TcKhWDErKi1yJOJr2TtMNkAYfHHID4fIZmYghEU&s=PjJi5ShMKDBdOTQEM8Ts_3hNHHK3LRdd1DacgLrICNIg&e=

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> (08/16/18, Fugh, Justina): (b) (6)

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> (b) (6) <https://urldefense.proofpoint.com/v2/url?u=https-3A__www.integrity.gov_efeds-2Dforms-2Dharness_ui_reviewReport.html-23_assetincome_spouse_filing_11278D3A-2D2D39-2D4D27-2D97C4-2D4131B7F3B5CB_user_A333984_row_3B6A44D6-2DAA6E-2D4E2E-2D92C1-2D42E28F292116&d=DwMFAG&c=Rlm5WhGmPEr8srpDE4r86Q&r=VqoRkeE_5TDLJ3dg_fBnP_FE2i3QDPv7Z5MpUq8armE&m=SBx5TcKhWDErKi1yJOJr2TtMNkAYfHHID4fIZmYghEU&s=VzTEBfCSlr-pSShchXuL4kkq9l8yAe1Bc7VE6DAki60&e=>

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> (08/16/18, Fugh, Justina): (b) (6)

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> (b) (6) <https://urldefense.proofpoint.com/v2/url?u=https-3A__www.integrity.gov_efeds-2Dforms-2Dharness_ui_reviewReport.html-23_assetincome_others_filing_11278D3A-2D2D39-2D4D27-2D97C4-2D4131B7F3B5CB_user_A333984_row_B4831B2A-2D2F9C-2D4C9E-2DAFBE-2D2320797F4FE6&d=DwMFAG&c=Rlm5WhGmPEr8srpDE4r86Q&r=VqoRkeE_5TDLJ3dg_fBnP_FE2i3QDPv7Z5MpUq8armE&m=SBx5TcKhWDErKi1yJOJr2TtMNkAYfHHID4fIZmYghEU&s=NERPa-3Jg57tQlZJGszeh40VgPlf68afWZQmyDswFvY&e=>

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> (08/16/18, Fugh, Justina): (b) (6)

(b) (6)

Margaret

Ross is available to work with you or financial adviser to assist with entering the data.

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> 8.

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> (b) (6) <https://urldefense.proofpoint.com/v2/url?u=https-3A__www.integrity.gov_efeds-2Dforms-2Dharness_ui_reviewReport.html-23_liabilitiesgrid_filing_11278D3A-2D2D39-2D4D27-2D97C4-2D4131B7F3B5CB_user_A333984_row_9C0824E7-2D6BDE-2D49BA-2D87AA->

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> (08/16/18, Fugh, Justina): (b) (6)

That's a suggestion from the Office of Government Ethics' help guide.

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> (b) (6) <https://urldefense.proofpoint.com/v2/url?u=https-3A__www.integrity.gov_efeds-2Dforms-
2Dharness_ui_reviewReport.html-23_liabilitiesgrid_filing_11278D3A-2D2D39-2D4D27-2D97C4-
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> (08/16/18, Fugh, Justina): (b) (6)

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> (b) (6) <https://urldefense.proofpoint.com/v2/url?u=https-3A__www.integrity.gov_efeds-2Dforms-
2Dharness_ui_reviewReport.html-23_liabilitiesgrid_filing_11278D3A-2D2D39-2D4D27-2D97C4-
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2D4CAA40381807&d=DwMFAG&c=Rlm5WhGmPEr8srpDE4r86Q&r=VqoRkeE_5TDLJ3dg_fBnP_FE2i3QDPv7Z5MpUq8arm
E&m=SB5TcKhWDErKi1yJOJr2TtMNkAYfHHID4fIZmYghEU&s=41oouRC1aBwAlmog-
ppSsuF6YJhLVXWZ3WD4LKn1A7k&e=>

>

> (08/16/18, Fugh, Justina): (b) (6)

>

>

> Best regards,

> Justina

>

> Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

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From: [Fugh, Justina](#)
To: (b) (6)
Cc: [Minoli, Kevin](#)
Subject: RE: a courtesy heads up
Date: Friday, August 10, 2018 5:24:00 PM

Hi there,

Just a note to confirm that we spoke, and I was able to explain the filing process a little more clearly. With your help, Mr. Pruitt will be filing his annual report (to cover CY 2017) on or before Monday, August 13th. EPA then has up to 30 days to review the report before we are required to release it upon request, and we will be using that 30 day period to work with you to be sure that he has duly reported what should be reported and correct any inadvertent errors. We will not release his report the day we receive it; rather, we will review it thoroughly first and work with you on his behalf to resolve any issues or questions. As we discussed, he absolutely may include endnotes and comments to his report to further explain whatever he would like to explain. I appreciate your telling me that his Legal Defense Fund was not established until 2018, so that will not appear on the annual report.

You asked about the definition of income for Part 2, and I steered you to the definition in INTEGRITY itself. I've pasted that definition below for your reference:

EARNED and OTHER NON-INVESTMENT INCOME

The financial disclosure rules distinguish between investment income, earned income, and other non-investment income.

INVESTMENT INCOME

"Investment income" includes interest, rents, royalties, dividends, capital gains, and other income derived from an asset. Examples of investment income include, but are not limited to, income derived from: stocks, bonds, investment funds, and other securities; real estate; retirement investment accounts; annuities; the investment portion of life insurance contracts; interests in trusts and estates; collectible items; commercial crops; accounts or other funds receivable; and businesses.

The definition of investment income for our purposes of financial disclosure is specifically not tied to the Internal Revenue Service's definition of income for tax purposes. You need to report accrued income, even if deferred or exempt for tax purposes. For example, tax-deferred income in a retirement account is reportable in your financial disclosure report. Where you do not receive a report of the amount accruing, such as with United States savings bonds, you may make a good faith estimate.

EARNED INCOME

"Earned income" includes fees, salaries, commissions, honoraria, and any other compensation received for personal services but excludes U.S. Government salary and other federal benefits, including retirement and veterans' benefits. If personal services are a material factor in the production of income from an asset or business, it is considered "earned income" for purposes of financial disclosure rather than "investment income."

OTHER NON-INVESTMENT INCOME

A remainder category exists for income that does not fit into the investment income or earned income categories. Examples include prizes, scholarships, awards, and gambling winnings.

Finally, with respect to the Southwest companion passes, allow me to explain that they would be reportable on the financial disclosure report as a gift only if Mr. Pruitt did not pay Mr. Wagner for the full cost of the tickets. Should he decide not to pay, then those tickets are likely reportable

entries on his report under “gifts.”

EPA consulted with the Office of Government Ethics (OGE) about the Southwest companion pass arrangement, asking whether it constituted an impermissible gift between employees under 5 C.F.R. Part 2635, Subpart C. Under these provisions, a “superior” cannot accept a gift of more than \$10 from any subordinate. OGE concluded that the company pass arrangement allowed a supervisor to accept the gift of a “discounted” rate from the subordinate. Because the discounted rate exceeded \$10, it could not be accepted under 5 C.F.R. § 2635.302(b). While there is “personal friendship” exception under the gifts-between-employees rules, it cannot be applied if there is a clear subordinate-official superior relationship between the two employees. See 5 C.F.R. § 2635.302(b).

OGE concluded that the discounted tickets were indeed gifts because each ticket had a clear and ascertainable value. OGE did not view the fee of \$5.60 as the “market value” of the ticket, but rather as a fee set forth at 49 C.F.R. § 1510.5 that is assessed for “nonrevenue passengers.” The fact that the airline does not receive remuneration and then charges a security fee does not mean that the value of the buddy pass is zero or even \$5.60. Instead, the value of the ticket is what it would otherwise cost for the superior to take the flight, which is ascertained by simply looking at the cost of what the subordinate paid for his ticket. In other words, OGE considers the market value of the gift to be the amount that the superior would have had to pay to fly, not the cost of the “free” ticket.

So Mr. Pruitt can either list the discounted Southwest Airlines tickets as a gift from Mr. Wagner, or he can repay Mr. Wagner and then not report that arrangement at all.

Please let me know if we can be of any further assistance. We look forward to assisting you in any way with Mr. Pruitt’s financial disclosure report.

Sincerely,
Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: (b) (6)
Sent: Friday, August 10, 2018 1:49 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: Minoli, Kevin <Minoli.Kevin@epa.gov>
Subject: RE: a courtesy heads up

Thank you for providing these letters. I appreciate it.

I would like to discuss with you some of the information discussed in the letters – Mr. Pruitt is concerned that he not sign anything that is incorrect and is aware that there are issues being reviewed regarding the items included in the letter you received. We do not want a subsequent finding of the existence of a gift to be used as a basis for some sort of recriminations or adverse proceedings by virtue of his having not disclosed such an item as a ‘gift’ on the financial disclosure reports – at this time, he is not aware of any reportable gifts. But we are also mindful of the fact that some of these alleged actions might somehow be translated by others into being deemed a ‘gift’.

I also have some specific questions regarding reporting of certain income in 2017 –

May I call you to discuss these items or do you prefer to either refer me to someone else or communicate in writing.

I appreciate your assistance. Thank you! (b) (6)

(b) (6)
P (b) (6)
C (b) (6)



From: Fugh, Justina [<mailto:Fugh.Justina@epa.gov>]

Sent: Friday, August 10, 2018 10:36 AM

To: (b) (6)

Cc: Minoli, Kevin

Subject: a courtesy heads up

Dear (b) (6),

I am writing to let you know that, yesterday, the EPA Designated Agency Ethics Official responded to a congressional inquiry from Senators Carper and Udall that, among other things, inquired about Mr. Pruitt’s financial disclosure obligations. I have attached the incoming letter for your reference, as well as a copy of our response (the letters are identical, so I’ve given you just one). We were asked to provide copies of the requests for extensions, which we have done (but we did redact your contact information).

If you have any questions regarding this response, please let me know.

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

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From: [Fugh, Justina](#)
To: [Ross, Margaret](#); [Minoli, Kevin](#)
Subject: RE: Call from Scott Pruitt re: 278
Date: Monday, August 13, 2018 2:09:00 PM

Hi Margaret,

Thanks for the information. (b) (5)

[REDACTED]

[REDACTED]

Justina

From: Ross, Margaret
Sent: Monday, August 13, 2018 2:05 PM
To: Minoli, Kevin <Minoli.Kevin@epa.gov>; Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Call from Scott Pruitt re: 278

Hi Justina and Kevin,

Just got off the phone with Scott Pruitt, who had a couple of lingering questions about his report before submitting.

(b) (5)

[REDACTED]

[REDACTED]

I told him that I'd bring the questions to you (b) (5)

[REDACTED]

(b) (5)

Best,
Margaret

Margaret Ross | Ethics Officer | Office of General Counsel | US EPA | William Jefferson Clinton Federal Building Room 4310A North | Washington, DC 20460 (for ground deliveries: 20004) | phone 202-564-3221

From: Fugh, Justina
Sent: Wednesday, September 05, 2018 10:17 AM
To: (b) (6)
Subject: Re: checking in regarding Mr. Pruitt's financial disclosure report

Hi,

Yeah, I wasn't sure about the reporting of client names when it's an LLC, so I have asked OGE for their dispositive answer. If indeed the names are not reportable — which may be the case — then adding a footnote would be very helpful. I hesitate to dictate to you what to enter, but perhaps it will be useful for you to know that we consider not just whether her clients are regulated by EPA. For our purposes, we will wonder whether any of her clients are “prohibited sources” of the agency's, which includes (in addition to being regulated by EPA) anyone doing business with EPA, seeking to do business with EPA, or is an organization whose majority of members are seeking to do or doing business with EPA or are regulated by EPA.

I am not working today, so have asked Margaret to help you with the entry of the transactions. And we will be happy to give Mr. Pruitt an additional 45 days to file his termination report. When I get to the office tomorrow. I'll let you know what his new due date will be.

Justina

Sent from my iPhone

> On Sep 4, 2018, at 5:35 PM, "(b) (6)" wrote:

>

> I'm working on all the changes from you and OGE- still awaiting some information to complete the form. Hopefully, will have that tomorrow. Fingers crossed!!

>

> We are not required by law to disclose a spouse's clients. However, we will include a statement that none of her clients are subject to regulation by the EPA. If you want different verbiage in that regard, happy to use that. Just let me know.

>

> Thanks.

>

> (b) (6)

(b) (6)

(cell)

> (b) (6) (office)

> Sent from my iPhone

>

> On Sep 4, 2018, at 4:21 PM, Fugh, Justina <Fugh.Justina@epa.gov<mailto:Fugh.Justina@epa.gov>> wrote:

>

> Hi there,

> I hope that you had an enjoyable Labor Day weekend. I'm writing to say that I heard from OGE about their questions regarding Mr. Pruitt's report. Set forth below are the questions that EPA had regarding his report, and I've inserted OGE's as well. One question that I've asked OGE – but have not yet heard back – is whether the names of Mrs. Pruitt's clients are reportable on the form. Also, we do still need to know that transaction information for the withdrawals.

>

> Just a time check reminder – we are obliged under the Ethics In Government Act to release the report to requestors no later than September 12th. Ideally, we like to have the form certified by the EPA ethics official first.

>

> Comments of Reviewing Officials

> PART

>

> #

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> REFERENCE
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> COMMENT
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> 3.
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> (b) (6) <https://urldefense.proofpoint.com/v2/url?u=https-3A__www.integrity.gov_efeds-2Dforms-2Dharness_ui_reviewReport.html-23_datagrid_arrangements_filing_11278D3A-2D2D39-2D4D27-2D97C4-2D4131B7F3B5CB_user_A333984_row_1C1B8A8E-2DC39A-2D47BB-2DA298-2DD8D040403E1F&d=DwMFAg&c=Rlm5WhGmPEr8srpDE4r86Q&r=VqoRkeE_5TDLJ3dg_fBnP_FE2i3QDPv7Z5MpUq8armE&m=DRDJMfUW4zHmZLZ70a2LwrNasd0v3DGwaKChRSGJBM&s=sPEcSW6fMLiOXErFgBE4JvLMMO_1lKjxHAOZmRXxamI&e=>
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> (08/16/18, Fugh, Justina): (b) (6)
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> 5.
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> (b) (6) <https://urldefense.proofpoint.com/v2/url?u=https-3A__www.integrity.gov_efeds-2Dforms-2Dharness_ui_reviewReport.html-23_assetincome_spouse_filing_11278D3A-2D2D39-2D4D27-2D97C4-2D4131B7F3B5CB_user_A333984_row_3B6A44D6-2DAA6E-2D4E2E-2D92C1-2D42E28F292116&d=DwMFAg&c=Rlm5WhGmPEr8srpDE4r86Q&r=VqoRkeE_5TDLJ3dg_fBnP_FE2i3QDPv7Z5MpUq8armE&m=DRDJMfUW4zHmZLZ70a2LwrNasd0v3DGwaKChRSGJBM&s=d9ZOOK1gspxFUVbzGeX04wmIm1Gw5TijpwQELWSi_zM&e=>
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> (08/16/18, Fugh, Justina): (b) (6)
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> 5.
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> (b) (6) https://urldefense.proofpoint.com/v2/url?u=https-3A__www.integrity.gov_efeds-2Dforms-2Dharness_ui_reviewReport.html-23_assetincome_spouse_filing_11278D3A-2D2D39-2D4D27-2D97C4-2D4131B7F3B5CB_user_A333984_row_3B6A44D6-2DAA6E-2D4E2E-2D92C1-2D42E28F292116&d=DwMFAg&c=Rlm5WhGmPEr8srpDE4r86Q&r=VqoRkeE_5TDLJ3dg_fBnP_FE2i3QDPv7Z5MpUq8armE&m=DRDJMfUW4zHmZLZ70a2LwrNasd0v3DGwaKChRSGJBM&s=d9ZOOK1gspxFUVbzGeX04wmIm1Gw5TijpwQELWSi_zM&e=>
>
> (08/17/18, Pruitt, Scott): (b) (6)
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>
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>
> COMMENT FROM OGE
>
>
> 1. Please report the spouse's small business using the guidance and the example below. The filer currently reports an LLC entry and a consulting firm. Rather than reporting "LLC distribution," the specific type of income is reportable for a small business, as well as the type of services (e.g., software, HR, engineering, etc.).
>
> Report a small business that your spouse operates in Part 5.

> Note that other entries in this guide specifically address farms<https://urldefense.proofpoint.com/v2/url?u=https-3A__www.oge.gov_Web_278eGuide.nsf_Content_5-2B-2D-2BSpouse-25E2-2580-2599s-2BEmpty-2BAssets-2BDocument-7EFarm-2B-28operated-2Bas-2Ba-2Bbusiness-29&d=DwMFAG&c=Rlm5WhGmPEr8srpDE4r86Q&r=VqoRkeE_5TDLJ3dg_fBnP_FE2i3QDPv7Z5MpUq8armE&m=DRDJMfUW4zHmZLZ70a2LwrNasd0v3DGwaKChRSGJBM&s=pNY-5fNti6IbTfomPEM_AYEz46BiGQqwhOeFIvlyxew&e=>, law firms<https://urldefense.proofpoint.com/v2/url?u=https-3A__www.oge.gov_Web_278eGuide.nsf_Content_5-2B-2D-2BSpouse-25E2-2580-2599s-2BEmpty-2BAssets-2BDocument-7ELaw-2BFirm-2B-28partnership-29&d=DwMFAG&c=Rlm5WhGmPEr8srpDE4r86Q&r=VqoRkeE_5TDLJ3dg_fBnP_FE2i3QDPv7Z5MpUq8armE&m=DRDJMfUW4zHmZLZ70a2LwrNasd0v3DGwaKChRSGJBM&s=2jYN7h_j3_8xNGo-64K9t5Lps36bGoOYWzP8m3TPE1I&e=>, and corporate stock<https://urldefense.proofpoint.com/v2/url?u=https-3A__www.oge.gov_Web_278eGuide.nsf_Content_5-2B-2D-2BSpouse-25E2-2580-2599s-2BEmpty-2BAssets-2BDocument-7EStock&d=DwMFAG&c=Rlm5WhGmPEr8srpDE4r86Q&r=VqoRkeE_5TDLJ3dg_fBnP_FE2i3QDPv7Z5MpUq8armE&m=DRDJMfUW4zHmZLZ70a2LwrNasd0v3DGwaKChRSGJBM&s=4y_MYQGfK_n8Vvc02LpKyYzjVmPMoLtSFDt5Pvuy3PM&e=>. See those entries for more targeted guidance if applicable.

> Description

>

> EIF

>

> Value

>

> Income Type

>

> Income Amount

>

> Advanced Systems, LLC (software)

>

> N/A

>

> \$500,001 - \$1,000,000

>

> business income

>

>

>

> ABC Holdings, Inc., S-Corp, d/b/a Jones Management Solutions (HR consulting)

>

> N/A

>

> \$15,001 - \$50,000

>

> business income

>

>

>

> Accountant, sole proprietor

>

> N/A

>

> \$1,001 - \$15,000

>

> accounting fees

>

>

>

> Piano teacher, sole proprietor

>

> N/A

>

> \$1,001 - \$15,000

>

> lesson fees

>

>

>

>

>

> 1. Does the spouse receive other compensation or other benefits from the LLC?

> * Severance payments?

> * Bonuses?

> * Deferred compensation?

> * Defined benefit plan?

> * Defined contribution plan?

> * Any other reportable items?

>

>

> 1. Has the spouse received any income for an appearance, speech or article through the LLC?

>

> 6.

>

> 2

>

> (b) (6) https://urldefense.proofpoint.com/v2/url?u=https-3A__www.integrity.gov_efeds-2Dforms-2Dharness_ui_reviewReport.html-23_assetincome_others_filing_11278D3A-2D2D39-2D4D27-2D97C4-2D4131B7F3B5CB_user_A333984_row_B4831B2A-2D2F9C-2D4C9E-2DAFBE-2D2320797F4FE6&d=DwMFAg&c=Rlm5WhGmPEr8srpDE4r86Q&r=VqoRkeE_5TDLJ3dg_fBnP_FE2i3QDPv7Z5MpUq8armE&m=DRDJMfUW4zHmZLZ70a2LwrNasd0v3DGwaKChRSGJBM&s=zmqC_UExtjRSe0xJe5ZPSi0sMepI0eZ9ZMx6Wvij1w4&e=>

>

> (08/16/18, Fugh, Justina): (b) (6)

(b) (6) Margaret Ross is available to work

with you or financial adviser to assist with entering the data.

>

> 8.

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> (b) (6) https://urldefense.proofpoint.com/v2/url?u=https-3A__www.integrity.gov_efeds-2Dforms-2Dharness_ui_reviewReport.html-23_liabilitiesgrid_filing_11278D3A-2D2D39-2D4D27-2D97C4-2D4131B7F3B5CB_user_A333984_row_9C0824E7-2D6BDE-2D49BA-2D87AA-2D73684C9B84BB&d=DwMFAg&c=Rlm5WhGmPEr8srpDE4r86Q&r=VqoRkeE_5TDLJ3dg_fBnP_FE2i3QDPv7Z5MpUq8armE&m=DRDJMfUW4zHmZLZ70a2LwrNasd0v3DGwaKChRSGJBM&s=7O9_oNhrpT5UVEZZDh7Ljio-ey-LQRdquqvEJLi8pys&e=>

>

> (08/16/18, Fugh, Justina): (b) (6)

(b) (6) That's a suggestion from the Office of Government Ethics' help guide.

>

> 8.

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> 2

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> (b) (6) <https://urldefense.proofpoint.com/v2/url?u=https-3A__www.integrity.gov_efeds-2Dforms-2Dharness_ui_reviewReport.html-23_liabilitiesgrid_filing_11278D3A-2D2D39-2D4D27-2D97C4-2D4131B7F3B5CB_user_A333984_row_163C6529-2D6F81-2D4D8D-2D96CE-2D17F9F6B7BFCA&d=DwMFAG&c=Rlm5WhGmPEr8srpDE4r86Q&r=VqoRkeE_5TDLJ3dg_fBnP_FE2i3QDPv7Z5MpUq8armE&m=DRDJMfUW4zHmZLZ70a2LwrNasd0v3DGwaKChtrSGJBM&s=dqartxGYzjHxGvaXSu9FkpdztY28glR1KL0DDiCKgLM&e=>

> (08/16/18, Fugh, Justina):

(b)

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> (b) (6) <https://urldefense.proofpoint.com/v2/url?u=https-3A__www.integrity.gov_efeds-2Dforms-2Dharness_ui_reviewReport.html-23_liabilitiesgrid_filing_11278D3A-2D2D39-2D4D27-2D97C4-2D4131B7F3B5CB_user_A333984_row_0CC262DB-2DDE53-2D4CBA-2DB9A0-2D4CAA40381807&d=DwMFAG&c=Rlm5WhGmPEr8srpDE4r86Q&r=VqoRkeE_5TDLJ3dg_fBnP_FE2i3QDPv7Z5MpUq8armE&m=DRDJMfUW4zHmZLZ70a2LwrNasd0v3DGwaKChtrSGJBM&s=OSspSn0BdlxDgmQiWhZt8APZfsi3J5MwPJXAlqaVy7E&e=>

> (08/16/18, Fugh, Justina): (b) (6)

> Please let me know if you have any questions.

> Justina

> Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

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From: [Ford, Hayley](#)
To: [Fugh, Justina](#)
Subject: Re: extension granted for Mr. Pruitt
Date: Tuesday, June 12, 2018 7:25:52 PM

All of the below. He needs to gather more information and given travel schedule and competing work commitments, needs more time.

Thank you!

Hayley

On Jun 12, 2018, at 7:23 PM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

Hi Hayley,

Yes, technically, he can have another extension, but he has to provide me with a reason for why he needs more time. For example, he needs to gather information or he will be on travel or has competing work commitments. We will accept any credible reason (really!) and then will be able to consider the extension.

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Ford, Hayley
Sent: Tuesday, June 12, 2018 2:58 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: extension granted for Mr. Pruitt

Hi Justina,

Administrator Pruitt would like to request one more extension for this disclosure. Is that permissible?

Thank you!

Hayley Ford

Deputy White House Liaison and Personal Aide to the Administrator
Environmental Protection Agency

ford.hayley@epa.gov

Phone: 202-564-2022

Cell: 202-306-1296

From: Fugh, Justina

Sent: Thursday, May 10, 2018 6:12 PM

To: Ford, Hayley <ford.hayley@epa.gov>

Subject: extension granted for Mr. Pruitt

Hi Hayley,

I have extended Mr. Pruitt's deadline to file his financial disclosure report. His report is now due on 6/29/18. If he finds he needs more time, then he could ask for one more extension.

Cheers,

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Fugh, Justina](#)
To: (b) (6)
Subject: RE: follow up to our conversation this morning
Date: Monday, August 20, 2018 6:23:00 PM

Ah. We'll see what OGE says, but maybe it's that (b) (6)
(b) (6) Hang tight until I hear back from OGE on Wednesday.

-----Original Message-----

From: (b) (6)
Sent: Monday, August 20, 2018 6:19 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Re: follow up to our conversation this morning

Thanks. I will send this to the investment advisor so he will know what we need.

As far as (b) (6)

(b) (6)

(b) (6) (cell)
(b) (6) (office)
Sent from my iPhone

On Aug 20, 2018, at 5:28 PM, Fugh, Justina <Fugh.Justina@epa.gov<<mailto:Fugh.Justina@epa.gov>>> wrote:

Hi there,

I'm sorry that it has taken me nearly all day to get back to you, but my day completely escaped me. With regard to Mr. Pruitt's annual report, it seems that he has (b) (6)

Let's see if this helps. I compared Mr. Pruitt's nominee report against his annual report. (b) (6)

NAME OF ASSET

PREVIOUSLY REPORTED ON NOMINEE REPORT

NOW REPORTING ON ANNUAL REPORT

DATE OF SALE?

AMOUNT OF TRANSACTION?

(b) (6)

(b) (6)

Because Mr. Pruitt's report will need to be certified by the Office of Government Ethics, I have asked them to engage now so that we have no surprises from their end later. I wondered about how he has reported (b) (6)

(b) (6)

so that's why I asked for their input. I should receive more information from OGE on Wednesday afternoon. Just letting you know that I'll be back in touch about that soon.
Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

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From: [Fugh, Justina](#)
To: [Minoli, Kevin](#); [Ross, Margaret](#)
Subject: RE: I just certified the report.
Date: Wednesday, September 12, 2018 1:36:00 PM
Attachments: [ScottPruitt annual 278.pdf](#)

Kevin,

Thanks. There is one small "typo" that you couldn't have anticipated, which is that the pdf version did not preserve the italicized font. So that general comment now includes those weird diacritical-like marks to show where the special font would have appeared. We can't do anything about it now, but I'm attaching the file so you can see it. Also, here is the list of people who will be receiving the report now.

Justina

Requestors:

Request					
#	Requested 278	Requested by	Requesting Org	email address	Date Received
30	Pruitt, Scott	(b) (6)			6/11/2018
32	Pruitt, Scott	(b) (6)			6/14/2018
34	Pruitt, Scott	(b) (6)			6/21/2018
35	Pruitt, Scott	(b) (6)			6/26/2018
36	Pruitt, Scott	(b) (6)			7/12/2018
37	Pruitt, Scott	(b) (6)			8/7/2018
38	Pruitt, Scott	(b) (6)			8/13/2018
39	Pruitt, Scott	(b) (6)			8/14/2018
40	Pruitt, Scott	(b) (6)			8/18/2018
41	Pruitt, Scott	(b) (6)			9/4/2018

-----Original Message-----

From: Minoli, Kevin

Sent: Wednesday, September 12, 2018 1:21 PM

To: Fugh, Justina <Fugh.Justina@epa.gov>; Ross, Margaret <Ross.Margaret@epa.gov>

Subject: I just certified the report.

Kevin S. Minoli

Principal Deputy General Counsel &

Designated Agency Ethics Official Office of General Counsel US Environmental Protection Agency Main Office Line: 202-564-8040

From: [Fugh, Justina](#)
To: [Minoli, Kevin](#)
Cc: [Ross, Margaret](#)
Subject: RE: I just certified the report.
Date: Wednesday, September 12, 2018 1:51:00 PM

Where are you ? what # to call?

From: Minoli, Kevin
Sent: Wednesday, September 12, 2018 1:43 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: Ross, Margaret <Ross.Margaret@epa.gov>
Subject: Re: I just certified the report

Can you please call me re: the list?

Kevin S Minoli
Principal Deputy General Counsel &
Designated Agency Ethics Official
Office of General Counsel
US Environmental Protection Agency
Main Office Line: 202-564-8040

On Sep 12, 2018, at 1:36 PM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

Kevin,
Thanks There is one small "typo" that you couldn't have anticipated, which is that the pdf version did not preserve the italicized font So that general comment now includes those weird diacritical-like marks to show where the special font would have appeared We can't do anything about it now, but I'm attaching the file so you can see it Also, here is the list of people who will be receiving the report now
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38	Pruitt, Scott	(b) (6)			8/13/2018
39	Pruitt, Scott	(b) (6)			8/14/2018
40	Pruitt, Scott	(b) (6)			8/18/2018
41	Pruitt, Scott	(b) (6)			9/4/2018

-----Original Message-----
From: Minoli, Kevin
Sent: Wednesday, September 12, 2018 1:21 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>; Ross, Margaret <Ross.Margaret@epa.gov>
Subject: I just certified the report

Kevin S Minoli
Principal Deputy General Counsel &
Designated Agency Ethics Official Office of General Counsel US Environmental Protection Agency Main Office Line: 202-564-8040
<EScottPruitt annual 278 pdf>

From: [Fugh, Justina](#)
To: (b) (6)
Cc: [Ross, Margaret](#)
Subject: RE: Pruitt Financial Disclosure
Date: Monday, August 06, 2018 12:57:00 PM

Hi there,

Yes, EPA uses INTEGRITY, and we will need to assign you as a "delegated person." Margaret Ross, copied here, can assist you with that. I'm out of the office today, but I can follow up with Margaret tomorrow if need be.
Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308
North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

-----Original Message-----

From: (b) (6)
Sent: Monday, August 06, 2018 11:21 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Pruitt Financial Disclosure

Justina - does EPA use the Integrity filing software for financial disclosure reporting? Or does EPA have / use a separate system? I need to log into whichever system is used by EPA as a filer assistant to Mr. Pruitt. If you can instruct me on what to do, I will appreciate it. Thank you! (b) (6)

(b) (6)
(b) (6)
cell)
(b) (6) (office)
Sent from my iPhone

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From: [Fugh, Justina](#)
To: [Ross, Margaret](#)
Subject: RE: Pruitt Financial Disclosure
Date: Monday, August 06, 2018 1:58:00 PM

Thanks for doing this, by the way!

-----Original Message-----

From: Ross, Margaret
Sent: Monday, August 06, 2018 1:55 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>; (b) (6)
Subject: RE: Pruitt Financial Disclosure

Greetings,

I've attached the instructions from the INTEGRITY user guide on how to add a designee. Please note that only Mr. Pruitt can add the designee (a designee cannot not add him/herself).

Please feel free to give me a call if you encounter any issues once you've been added as a designee (logging in, passwords, etc.). I'd be happy to help.

Best,
Margaret

Margaret Ross | Ethics Officer | Office of General Counsel | US EPA | William Jefferson Clinton Federal Building
Room 4310A North | Washington, DC 20460 (for ground deliveries: 20004) | phone 202-564-3221 | cell 202-527-0432

-----Original Message-----

From: Fugh, Justina
Sent: Monday, August 6, 2018 12:58 PM
To: (b) (6)
Cc: Ross, Margaret <Ross.Margaret@epa.gov>
Subject: RE: Pruitt Financial Disclosure

Hi there,
Yes, EPA uses INTEGRITY, and we will need to assign you as a "delegated person." Margaret Ross, copied here, can assist you with that. I'm out of the office today, but I can follow up with Margaret tomorrow if need be.
Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308
North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

-----Original Message-----

From: (b) (6)
Sent: Monday, August 06, 2018 11:21 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Pruitt Financial Disclosure

Justina - does EPA use the Integrity filing software for financial disclosure reporting? Or does EPA have / use a

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